



June 27, 1991



Steven H. Wisness
Hanford Project Manager
U.S. Department of Energy
P.O. Box 550 A5-19
Richland, Washington 99352

Re: Extension Request for 1100-EM-1 Operable Unit RI/FS Schedule

Dear Mr. Wisness:

We received your June 20, 1991, extension request letter on June 21, 1991. Specifically, you requested us to extend the schedule for the Remedial Investigation (RI) Phase II Report (M-15-01B) by 14 months (November 1991 to January 1993). Additionally, you requested us to extend the schedule for the Feasibility Study (FS) Phase III Report (M-15-01C) by nine months (April 1992 to January 1993). You proposed to combine these two milestones into a single RI/FS Report, due in January 1993.

I have discussed your proposal with staff and contractor representatives and have determined that we can not approve the RI/FS schedule extension request. Therefore, the June 20 request for schedule extension is disapproved. This decision is based on our evaluation of the time and activities proposed for the extension period and on the justification provided to support your June 20 package.

One primary reason for disapproval of the extension request is the lack of progress that has been made at the 1100-EM-1 Operable Unit RI/FS over the past several months. Beginning with Department of Energy (DOE) resolution of comments on the RI Phase I report in October 1990, a great deal of time has been lost while debating the validity of our comments. As one example, construction of the majority of the groundwater monitoring wells to be installed under the RI Phase II began only last month. We have attempted to communicate our need for information during the last several unit manager meetings and much of the required work is now underway. We believe that the work remaining to complete the RI/FS at the Horn Rapids Landfill (HRL) is straightforward and can be done very soon.

The isotopic analysis to determine the source of alpha contamination is important information necessary to complete the RI/FS. However, this task was to have been completed last spring and delay of this task can not be used to support an extension request at this time. The laboratory turnaround times in the Hanford Federal Facility Agreement and Consent Order are very specific. Failure to meet those times does not provide good cause for an extension request. This is an issue that must be resolved between DOE and its contract laboratory.

The proposed treatability testing activities, including a degradation study for trichloroethylene (TCE) and sedimentation jar tests for radionuclides, are topics that we need to discuss further. We believe there are ways to obtain the necessary results without spending months on further testing.

The proposed schedule extension request contains several intermediate deliverables in the form of specific technical reports. We question the need for stand alone reports on the various subjects and would suggest that we increase the dialogue between DOE, the regulators, and the respective contractors as we get closer to finalizing this project. It appears that the amount of time for internal review of reports and documents is excessive. Such review cycles do not support our joint goal of streamlining the RI/FS process.

The next round of groundwater monitoring well sampling for the HRL should be scheduled immediately after completion, development, and stabilization of the last monitoring well to be constructed in the current series (i.e., MW-19 through MW-22). We are willing to base the RI/FS Report on groundwater data that includes only one round of analyses for these wells, with the understanding that sampling will continue on a quarterly basis.

We understand the complexity added to this project by the apparent migration of groundwater contamination from an off-site source. We agree that contamination appears to be originating from the Advanced Nuclear Fuels (ANF) facility, which is adjacent to the HRL. In light of this information obtained under the RI Phase I, we believe it is appropriate to extend the schedule to complete the RI Phase II activities by a period not to exceed five months. This is an ample period of time for DOE to have reached agreement with ANF regarding responsibilities of each party and to have begun the necessary field activities.

We concur that it may be advantageous to combine the two interim milestones in question to make a single RI/FS Report. This report would be due in April 1992 and would contain the Proposed Plan. The Environmental Protection Agency would then proceed with issuance of the Record of Decision. If you wish to

June 27, 1991

apply for a five month schedule extension for the RI Phase II Report and combine it with the final RI/FS Report in April 1992, a separate change request for that purpose will be required.

If you have questions on any of the above, please contact me at (509) 376-6623 or David Einan at (509) 376-3883.

Sincerely,


Paul T. Day
Hanford Project Manager

Enclosure

cc: (with enclosure -- June 20, 1991 change package)

George Hofer, EPA
Administrative Record -- 1100-EM-1 Operable Unit

cc: (without enclosure)

Tim Nord, Ecology
Julie Erickson/Robert Stewart, DOE
~~Tim Veneziano, WHO~~
John Stewart, USACE

CORRESPONDENCE DISTRIBUTION COVERSHEET

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Subject: EXTENSION REQUEST FOR 1100-EM-1 OPERABLE UNIT RI/FS SCHEDULE

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